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5 Attorneys for Plaintiff
6 SCOTT BRYNING

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 SCOTT BRYNING,

12 Plaintiff,

13 v.

14 BEST BUY CO., INC., a Minnesota
15 Corporation doing business in California as
16 MN BEST BUY CO., INC.; BEST BUY
17 STORES, L.P., a Virginia Limited
18 Partnership, and DOES 1 through 20,
inclusive,

Defendants.

CASE NO. 3:07-cv-05741-JSW

**PLAINTIFF'S REQUEST TO
EXTEND NON-EXPERT
DISCOVERY CUT-OFF**

Honorable Jeffrey S. White

19 The plaintiff hereby submits a request to extend the current deadline to complete non-
20 expert discovery as follows:

21 1. Extend the deadline for non-expert discovery from Sunday, June 1, 2008, to
22 Monday, June 30, 2008.

23 There is good cause for the request in that plaintiff's counsel has a trial in July
24 beginning July 7 through July 25, 2008, in Superior Court which discovery cut-off necessitates
25 the taking of multiple depositions until the June 6 non-expert discovery cut-off throughout
26 California, including Southern California. Thereafter, expert depositions will be taken and
27 other pre-trial motions and hearings have been scheduled/are anticipated.

28 The defendant has requested a similar amount of time (28 days) from July 11, 2008, to

Plaintiff's Request to Extend Non-expert Discovery Deadline

1 August 8, 2008, to move the summary judgment hearing cut-off to which the plaintiff has
2 agreed. The plaintiff is asking for parity in the amount of time extended to both deadlines.
3 The defendant has only agreed to move the non-expert discovery deadline through June 20,
4 2008.

5 The parties have also been delayed in completion of discovery because they have been
6 attempting diligently to settle the matter informally. See the accompanying Declaration of
7 William F. Adams in support of the plaintiff's request to extend the non-expert discovery
8 deadline.

9 The plaintiff is not seeking to move or extend any other deadline. There have been no
10 prior extensions sought or granted in this matter by either party.

11 Respectfully submitted,

12 WILLIAM F. ADAMS LAW OFFICES

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14 Dated: May 20, 2008

By: 

15 William F. Adams
16 Attorneys for Plaintiff SCOTT BRYNING
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